

REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. Applicant has amended Claims 37, 43, 55, 72 and 89 and cancelled Claim 38. Applicant respectfully submits that these amendments add no new matter. Thus, Claims 37 and 39-105 remain pending in the application. This application has been carefully reviewed in light of the Official Action mailed December 15, 2006. Applicant respectfully requests reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 112

Claims 43 stands rejected under 35 U.S.C. § 112, second paragraph. Applicant has amended Claim 43 and respectfully submits that this rejection is now moot. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 102

Claims 37-43, 52-59, 69-76, 86-93 and 103-105 stand rejected as anticipated by U.S. Publication No. 2002/0046262 ("Heilig").

Claim 72 recites a device having instructions executable to provide a client-facing filesystem interface, provide a server-facing filesystem interface, receive a filesystem request from a requesting client according to the client-facing filesystem interface, pass the filesystem request to a server as a proxy request according to the server-facing filesystem interface, wherein passing the first filesystem request as a proxy request comprises applying a set of rules to the first filesystem request to determine if the first filesystem request should be modified and if it is determined that the first filesystem request should be modified, modifying the first filesystem request to generate the proxy request, receive a server response from the server according to the server-facing interface; and pass the server response to the requesting client as a proxy response.

Thus, embodiments of the invention may receive a filesystem request from a client (e.g. a client request) and pass the filesystem request to a server as a proxy request. As disclosed at paragraph [0122] of the Specification, the proxy request can be the same as the original filesystem request or may be arbitrarily modified from the original filesystem request. In one embodiment, the original filesystem may be evaluated to determine if it should be modified and if so, the original filesystem request modified to create the proxy request.

Heilig in contrast, discloses a method for visualizing data stored at a remote host on a computer network. In Heilig, a proxy server receives a request for data from a client (a client data request). The proxy server transmits the client data request on behalf of the client to an appropriate location, for example a data server. The requested data (e.g. a response to the client data request) is then transmitted to the proxy server. The proxy server may then make a determination whether any of this requested data should be rendered. In the case where the proxy server determines that rendering is not necessary the requested data may be transmitted directly to the client who requested the data. If the proxy server determines that rendering is necessary, the requested data (e.g. the data received in response to the client data request) is rendered appropriately and the rendered data transmitted to the client. Rendering, for example, may be necessary where the client does not have the necessary software tools to visualize the requested data. (See, Heilig Paragraphs 61, 66, 67, 68 FIGS 3A, 3B and 7).

Thus, it appears if the client data request of Heilig is passed directly to the data server unaltered and it is the data received in response to the client data request that is rendered. The Examiner, however, specifically cites paragraph 61 of Heilig for the proposition that Heilig discloses “modifying the filesystem request to generate the proxy request.” More particularly, the Examiner cites the language of paragraph 61 of Heilig which recites “further the proxy server may utilize information included in the client request to determine whether a rendering i.e. further processing or rewriting of the data is necessary before transmission to the client,” for his proposition that Heilig teaches “modifying the filesystem request to generate the proxy request.”

The Applicant respectfully disagrees with the Examiner’s interpretation of the cited language of paragraph 61 of Heilig. The language of paragraph 61 cited by the Examiner clearly refers to the analysis of a client data request to determine if requested data received from a data server in response to the client data request should be rendered. Thus, Heilig may use information in the client data request to determine if data received in response to that request should be modified. Heilig does not, however, determine if the client data request itself should be modified.

The disclosure of Heilig that data received in response to a client data request can be rendered is not equivalent to the limitation of “modifying the filesystem request to generate a proxy request.” Therefore, Applicant respectfully submits that Heilig does not disclose at least the limitation of Claim 72 which recites “pass[ing] the filesystem request to a server as a proxy

request according to the server-facing filesystem interface, wherein passing the first filesystem request as a proxy request comprises applying a set of rules to the first filesystem request to determine if the first filesystem request should be modified and if it is determined that the first filesystem request should be modified, modifying the first filesystem request to generate the proxy request.”

Accordingly, as Claims 37, 55 and 89 recite limitations similar to those of Claim 72, withdrawal of the rejection of Claim 37, 55, 72, 89 and their respective dependent Claims 39-43, 52-59, 69-76, 86-93 and 103-105 is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 44-51, 60-68, 77-85 and 94-102 stand rejected as obvious over U.S. Publication No. 2002/0046262 (“Heilig”) in view of U.S. Patent No. 5,870,734 (“Kao”). As Claims 44-51, 60-68, 77-85 and 94-102 depend from Claims 37, 55, 72 or 89 Applicant respectfully submits that the above arguments presented with respect to Claims 37, 55, 72 or 89 apply equally well here. Accordingly, withdrawal of this rejection is respectfully requested.

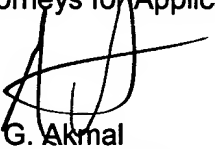
CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 37 and 39-105. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

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Date: March 15, 2007

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